



Montana Department of  
**ENVIRONMENTAL QUALITY**

Steve Bullock, Governor  
Tracy Stone-Manning, Director

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July 31, 20114

Cheryl Driscoll  
Glencore Ltd.  
301 Tresser Blvd Ste 1500  
Stamford, CT 06901

Re: Columbia Falls Aluminum Plant

Dear Ms. Driscoll:

We indicated to you that we would provide you a proposal and outline on how we could proceed to address the Columbia Falls Aluminum Plant through a State-lead process. Rather than just provide a conceptual outline, we decided that it would be more productive to give you a fully detailed framework for addressing the releases at the site through the State's Comprehensive Environmental Cleanup and Responsibility Act.

Accordingly, I have enclosed a draft Administrative Order on Consent for conducting a remedial investigation/feasibility study at the Columbia Falls Aluminum Plant. The draft order includes scopes of work for a remedial investigation, risk assessment, and feasibility study. We believe that providing this level of detail will allow us to come to a common understanding of whether the site can be addressed under State authorities, rather than federal authorities, fairly quickly.

We would like your initial reaction whether you are interested in pursuing this option after you have the chance to review the enclosed materials. (Hopefully, we could receive your initial reaction by August 15, 2014.)

If you are interested in pursuing this approach, we would need to receive any specific comments by September 1, 2014, so that we could respond and determine whether or not an AOC can be finalized by September 15. We are certainly willing to consider any specific comments, but negotiations should not be expected to take too long, because an AOC will have to be substantially in this form in order to proceed down the State-lead path.

Let us know if you would like to have a conference call to discuss issues or details at any time during this process. We hope that by providing a detailed proposal, we are able to eliminate any confusion or misunderstanding about the type of approach that would be required.

Cheryl Driscoll  
Page Two  
July 31, 2014

We look forward to your initial response and hope that we can have the AOC finalized and signed by September 15. If you have any questions or need additional information, please feel free to contact me:

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Division Administrator, Remediation Division  
Montana Department of Environmental Quality  
P. O. Box 200901  
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(406) 841-5001  
[jchambers@mt.gov](mailto:jchambers@mt.gov)

Sincerely,



Jenny Chambers  
Division Administrator  
Remediation Division

cc: (by e-mail only)  
Andrew Otis  
John Stroiazzo  
Steve Wright